

EXHIBIT # A

From: Judd Burstein jburstein@burlaw.com
Subject: RE: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)
Date: January 12, 2022 at 6:25 PM
To: Tyrone Blackburn tblackburn@tablackburnlaw.com
Cc: Steven Ciar's Husband sg@nytlaw.com, Michael J. Snizek msnizek@mcgivneyandkluger.com, Tara E. Faenza tfaenza@mcgivneyandkluger.com, Peter B. Schalk pschalk@burlaw.com, Victor Weberman VWeberman@burlaw.com, Emily Finestone EFinestone@burlaw.com, Steven D. Isser sisser@isserlaw.com

Sure, how about:

March 4 for motion

March 25 for your answers

April 3 for my reply.

Steven and Tara: Does this work for you?

Judd Burstein
Judd Burstein, P.C.
260 Madison Avenue
15th Floor
New York, New York 10016
(212) 974-2400
(212) 974-2944 (Fax)

**MY APOLOGIES IN ADVANCE FOR ANY TYPOGRAPHICAL
AND/OR GRAMMATICAL ERRORS. I AM A TERRIBLE TYPIST
AND PROOFREADER – PARTICULARLY WHEN I AM DRAFTING
AN EMAIL UNDER TIME PRESSURE**

From: Tyrone Blackburn <tblackburn@tablackburnlaw.com>
Sent: Wednesday, January 12, 2022 6:21 PM
To: Judd Burstein <jburstein@burlaw.com>
Cc: Steven Ciar's Husband <sg@nytlaw.com>; Michael J. Snizek <msnizek@mcgivneyandkluger.com>; Tara E. Faenza <tfaenza@mcgivneyandkluger.com>; Peter B. Schalk <pschalk@burlaw.com>; Victor Weberman <VWeberman@burlaw.com>; Emily Finestone <EFinestone@burlaw.com>; Steven D. Isser <sisser@isserlaw.com>
Subject: Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

Judd,

I am traveling on those dates in the month of February. We can move the initial filing to the month of March.

Regards,

Tyrone A. Blackburn, Esq.
T. A. Blackburn Law, PLLC.
Phone: 347-342-7432
[TABlackburnlaw.com](http://TAMblackburnlaw.com)

On Jan 12, 2022, at 6:19 PM, Judd Burstein <jburstein@burlaw.com> wrote:

Tyrone and Tara: Is my briefing schedule acceptable to both of you?

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UNDER TIME PRESSURE**

From: Steven Gordon <sg@nytlaw.com>
Sent: Wednesday, January 12, 2022 5:30 PM
To: Judd Burstein <jburstein@burlaw.com>
Cc: Tyrone Blackburn <tblackburn@tablackburnlaw.com>; Michael J. Snizek <msnizek@mcgivneyandkluger.com>; Tara E. Faenza <tfienza@mcgivneyandkluger.com>; Peter B. Schalk <pschalk@burlaw.com>; Victor Weberman <VWeberman@burlaw.com>; Emily Finestone <EFinestone@burlaw.com>; Steven D. Isser <sisser@isserlaw.com>
Subject: Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

My firm and I agree to your schedule.

On Wed, Jan 12, 2022 at 5:22 PM Judd Burstein <jburstein@burlaw.com> wrote:

Steven, I have no idea what you are talking about. You have every right to ignore my well-deserved outrage at you and your counsel's appalling conduct, but I also asked you to agree to a briefing schedule for my sanctions motion. Are you refusing to do so?

sanctions motion. Are you refusing to do so?

Judd Burstein
Judd Burstein, P.C.
260 Madison Avenue
New York, New York 10016
jburstein@burlaw.com
(917) 687-2981

.Sent from my T-Mobile 5G Device
Get [Outlook for Android](#)

From: Steven Gordon <sg@nytlaw.com>
Sent: Wednesday, January 12, 2022 5:14:15 PM
To: Judd Burstein <jburstein@burlaw.com>
Cc: Tyrone Blackburn <tblackburn@tblackburnlaw.com>; Michael J. Snizek <msnizek@mcgivneyandkluger.com>; Tara E. Faenza <tfienza@mcgivneyandkluger.com>; Peter B. Schalk <pschalk@burlaw.com>; Victor Weberman <VWeberman@burlaw.com>; Emily Finestone <EFinstein@burlaw.com>; Steven D. Isser <sisser@isserlaw.com>
Subject: Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

Counselor:

Please address all communications with me or anyone at my firm through the Court. If we receive another threatening email, we will definitely be forced to send it and all of the other threatening emails to the disciplinary committee -- including, your January 10, 2022 email in which you threaten allegations of criminal conduct to coerce us into dropping a civil case. And these are notwithstanding the personal causes of action that I have against you.

On Wed, Jan 12, 2022 at 3:38 PM Judd Burstein <jburstein@burlaw.com> wrote:

Counsel:

I am pleased to see that you and Ms. Hough have come to your senses and have dismissed this appalling lawsuit against Nicki Minaj, which has inexcusably wasted my time and her money over the past three months. In my view, your conduct in pursuing this case against Nicki represents the worst of our legal system: bottom-feeding lawyers who pursue frivolous actions against a celebrity assuming that they will be paid off if they throw up enough dirt. As I told you during our one virtual meeting, Nicki would **never** pay a dime to your client. I was

correct. You ultimately were forced to surrender without you or your client receiving a penny.

In all events, while your dismissal of the Amended Complaint may be the end of your efforts to extort Nicki into a settlement, it is just the beginning of Nicki's and my efforts to make you pay for your disgraceful conduct with both money and, if the Court recommends it, disciplinary sanctions. You forced my client to spend over \$300,000 in fees to defend a case which even my Labradoodle, Gracie, could see was frivolous on both the facts and the law.

While you availed yourself of Rule 11's safe harbor provision to avoid having to defend against the sanctions motion with which I served you on Sunday, there are other Rule 11 motions which I served in 2021 and which I now intend to file. Further, I intend to seek sanctions against all of you pursuant 28 U.S.C. § 1927 and/or the Court's inherent power.

Accordingly, I would like to agree upon a schedule for those motions, which we could then submit to the Court. I propose the following:

February 2, 2021:	Our motion
February 23, 2021:	Your answering papers
March 9, 2021:	Our reply.

Please let me know if this is acceptable.

Judd Burstein
Judd Burstein, P.C.
260 Madison Avenue
15th Floor
New York New York 10016

NEW YORK, NEW YORK 10010
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DRAFTING AN EMAIL UNDER TIME PRESSURE**

From: Tara E. Faenza <tfaenza@mcgivneyandkluger.com>
Sent: Friday, December 31, 2021 1:22 PM
To: Judd Burstein <jburstein@burlaw.com>; Steven Gordon <sg@nytlaw.com>; Steven D. Isser <sisser@isserlaw.com>
Cc: Tyrone Blackburn <tblackburn@tablackburnlaw.com>; Michael J. Snizek <msnizek@mcgivneyandkluger.com>; Victor Weberman <VWeberman@burlaw.com>; Emily Finestone <EFinestone@burlaw.com>
Subject: RE: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

Dear Mr. Burstein:

Happy New Year.

Please note that we request to know if you are planning to file the Exhibit “Jennifer_Hough.pdf”, redacted the same as in the Motion emailed to us on December 8th? If so, aside from the fact that the document is inadmissible unverified hearsay. If the exhibit is the same as what was attached on December 8th we have no objection other than hearsay. Kindly please confirm.

This case alleges your clients engaged in conduct which threatened Ms. Hough’s safety and that her family (including minor/adult children). Public filing of the majority of the information in that PDF is **exceptionally dangerous**. We draw to your attention that a fan of Ms. Maraj publicized one of Ms. Hough’s former addresses, causing her to move immediately. Previously, as in the complaint, Ms. Maraj’s/Mr. Petty’s associates are alleged to have come to Ms. Hough’s residential locations, causing her to fear for her life. Respectfully, we understand your clients disagree, but for the sake of both Ms. Hough and innocent third parties’ safety, this exhibit should be under seal and also redacted. The names Jennifer and/or Hough are relatively common, some information could relate to others. Since Ms. Hough lived with multiple family members in the past, their safety unnecessary becomes at issue if prior residential address are included.

On a separate note, we are deeply saddened to learn of the horrific passing of Angela Kukawski at violent ends, and extend our sincere condolences. This event is a sober reminder that violence is sadly commonplace. Once

personal information becomes public, there no way to control how others will use it. For example, we have no way of knowing of any of the third parties in that report have people who may want to harm them. Those portions of the report are not relevant to this case, but for the sake of safety, any information that could reach third parties should be filed under seal. We believe that this report is irrelevant to the Motion for Judicial Default (or the response), and poses a substantial risk to Ms. Hough and third parties. Therefore, we respectfully assert that this exhibit should filed under seal, redacted. This solution presents no prejudice to your clients. All references to this exhibit (or future similar exhibits) should be cleansed of personal information which could bring harm to Ms. Hough or others. There are other objections, which we do not waive or address here, but note that any information beyond attempting to verify telephone numbers should be redacted,

We started with the option of you submitting the exhibit as previously sent to us. Otherwise, we propose the option of substantial redactions of third parties and other information, as well as filing under seal.

Thank you,

Tara E. Faenza

<image001.png>

Tara E. Faenza

Senior Associate

Brickell City Tower

80 SW 8th Street, Suite 2000

Miami, FL 33130

18 Columbia Turnpike, Suite 300

Florham Park, NJ 07932

www.mkcilaw.us.com

Cell Phone 862-273-7114

Reception 305 423-7189

Direct 305-423-7189

Fax 973-822-1116

Florham Park, NJ | Miami | New York | Philadelphia | Syracuse | Hartford | Wilmington, DE
| Sparta, NJ

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From: Judd Burstein <jburstein@burlaw.com>
Sent: Friday, December 31, 2021 11:40 AM
To: Steven Gordon <sg@nytlaw.com>; Steven D. Isser <sisser@isserlaw.com>
Cc: Tyrone Blackburn <tblackburn@tblackburnlaw.com>; Michael J. Snizek <msnizek@mcgivneyandkluger.com>; Tara E. Faenza <tfaenza@mcgivneyandkluger.com>; Victor Weberman <VWeberman@burlaw.com>; Emily Finestone <EFinestone@burlaw.com>
Subject: RE: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

The papers we are filing today include two redacted exhibits. Here are the unredacted versions.

Judd Burstein
Judd Burstein, P.C.
260 Madison Avenue
15th Floor
New York, New York 10016
(212) 974-2400
(212) 974-2944 (Fax)
(917) 687-2981 (Cell—Best number)

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From: Steven Gordon <sg@nytlaw.com>
Sent: Monday, November 22, 2021 9:55 PM
To: Steven D. Isser <sisser@isserlaw.com>
Cc: Tyrone Blackburn <tblackburn@tblackburnlaw.com>; Judd Burstein <jburstein@burlaw.com>; Michael J. Snizek <msnizek@mcgivneyandkluger.com>; tfaenza@mkcilaw.us.com
Subject: Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

Ok, great. Thanks, appreciate it. Attached please find the Reply MOL and one exhibit to it.

On Mon, Nov 22, 2021 at 9:47 PM Steven D. Isser <sisser@isserlaw.com> wrote:

I didn't think they were intentional. I was able to fix some of the formatting errors and just scanned hard copies for the others. Everything on my motion (and your opp) has been efiled. I will send the courtesy copies tomorrow

Law Offices of Steven D. Isser

424 Madison Avenue, Third Floor
New York, New York 10017
Tel: (212) 812-5096
sisser@isserlaw.com

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From: Steven Gordon [mailto:sg@nytlaw.com]
Sent: Monday, November 22, 2021 9:45 PM
To: Steven D. Isser <sisser@isserlaw.com>
Cc: Tyrone Blackburn <tblackburn@tblackburnlaw.com>; Judd Burstein <jburstein@burlaw.com>; Michael J. Snizek <msnizek@mcgivneyandkluger.com>; tfaenza@mkcilaw.us.com
Subject: Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

Sorry, Steve. Just saw this and promise that any errors were unintentional.

On Mon, Nov 22, 2021 at 9:28 PM Steven D. Isser <sisser@isserlaw.com> wrote:

There are format errors with many of your opposition documents. I am scanning them and then will try to file my scan of the documents

Law Offices of Steven D. Isser
424 Madison Avenue, Third Floor
New York, New York 10017
Tel: (212) 812-5096
sisser@isserlaw.com

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From: Steven Gordon [mailto:sg@nytlaw.com]
Sent: Monday, November 22, 2021 9:01 PM
To: Steven D. Isser <sisser@isserlaw.com>
Cc: Tyrone Blackburn <tblackburn@tblackburnlaw.com>; Judd Burstein <jburstein@burlaw.com>; Michael J. Snizek <msnizek@mcgivneyandkluger.com>; tfaenza@mkcilaw.us.com
Subject: Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

Thanks, Steve. You can upload everything onto to Pacer. We're uploading our reply soon, and will email you a copy as well.

On Mon, Nov 22, 2021 at 8:59 PM Steven D. Isser <sisser@isserlaw.com> wrote:

Tyrone and Steve,
Attached please find Defendant Petty's Reply papers in further support of his motion to vacate the Certificate of Default, which consist of:

1. Reply Memorandum of Law
2. Reply Declaration of Steven D. Isser
3. Exhibits 1-5 to the Isser Reply Declaration.

Law Offices of Steven D. Isser
424 Madison Avenue, Third Floor
New York, New York 10017
Tel: (212) 812-5096
sisser@isserlaw.com

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From: Tyrone Blackburn [mailto:tblackburn@tablackburnlaw.com]
Sent: Monday, November 8, 2021 11:46 PM
To: Steven D. Isser <sisser@isserlaw.com>
Cc: Steven Ciar's Husband <sg@nytlaw.com>; Judd Burstein
<jburstein@burlaw.com>
Subject: Re: Hough v. Maraj -- Dkt. No. 210CV-04568 (E.D.N.Y.)

Steven,

See attached.

Regards,

Tyrone A. Blackburn, Esq.
T. A. Blackburn Law, PLLC.
Phone: 347-342-7432
TABlackburnlaw.com

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Steven N. Gordon, Esq.
Tsyngauz & Associates, P.C.
114 Mulberry Street, Ground Floor
New York, NY 10013
Telephone: (212) 337-9770
Facsimile: (212) 337-3375
Email: sg@nytlaw.com

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Steven N. Gordon, Esq.
Tsyngauz & Associates, P.C.
114 Mulberry Street, Ground Floor
New York, NY 10013
Telephone: (212) 337-9770
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